

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LUIS IVAN MARRERO MARTINEZ  
ANA EVELYN ORTIZ SANTOS

DEBTORS

CASE NO. 18-03283 BKT

CHAPTER 13

**MOTION REQUESTING CONTINUANCE OF CONFIRMATION HEARING  
SCHEDULED FOR JANUARY 31, 2019 AT 9:00AM DOCKET NO. 19**

**TO THE HONORABLE COURT:**

**COME NOW, the Debtors LUIS IVAN MARRERO MARTINEZ and ANA EVELYN ORTIZ SANTOS**, through the undersigned counsel, and very respectfully state, allege and pray as follows:

- 1.** On July 20, 2018 the Debtors filed Adversary Proceeding No. 18-00086 BKT, under FRBP Rule 7001(a): Validity, priority or extent of lien or other interest in property.
- 2.** In the present Chapter 13 case, the Court scheduled a confirmation hearing for January 31, 2019 at 9:00AM, Docket No. 19. Confirmation of the Debtor's proposed Chapter 13 Plan hinges on the outcome of the aforesated Adv. Proc 18-00086. The Plan is not ready for confirmation.
- 3.** The Debtors respectfully request from this Honorable Court to continue the Chapter 13 confirmation hearing for a future date since the present case is not ready for confirmation.
- 4.** The Debtors respectfully submit that in further support of this motion for continuance, it is stated that said continuance of the confirmation hearing is not requested for the purpose of delay and will not cause any prejudice, but on the contrary, will benefit all parties to the present case.

Page - 2 -  
Debtors' Request for Continuance  
of Confirmation Hearing  
Case no. 18-03283 BKT13

**WHEREFORE**, the Debtors respectfully request that for the above stated reasons this Honorable Court grant the requested continuance of the confirmation hearing scheduled for January 31, 2019, at 9:00AM, in the present case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notice of same to all CM/ECF participants including: Alejandro Oliveras Rivera, Esq. Chapter 13 Trustee; and to the Debtors Luis Ivan Marrero Martinez and Ana Evelyn Ortiz Santos, Urb Borinquen Valle 2 468 Capuchino Street Caguas PR 00725.

**RESPECTFULLY SUBMITTED**, in San Juan, Puerto Rico, this 30<sup>th</sup> day of January, 2019.

/s/Roberto Figueroa Carrasquillo  
USDC #203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
ATTORNEY FOR the DEBTORS  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699 FAX 787-746-5294  
EMAIL: rfigueroa@rfclawpr.com